

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE FACEBOOK, INC., IPO SECURITIES  
AND DERIVATIVE LITIGATION

MDL No. 12-2389

ECF Case

This document relates to the  
Consolidated Nasdaq Actions

No. 12-cv-4054	No. 12-cv-4600
No. 12-cv-4200	No. 12-cv-4716
No. 12-cv-4201	No. 12-cv-5549
No. 12-cv-4315	No. 12-cv-5630
No. 12-cv-4403	No. 12-cv-6882

**PLEADING IN INTERVENTION FOR LIMITED PURPOSES**

1. Proposed Intervenors are Facebook, Inc., Mark Zuckerberg, Sheryl K. Sandberg, David Ebersman, David M. Spillane, Marc L. Andreessen, Erskine B. Bowles, James W. Breyer, Donald E. Graham, Reed Hastings, and Peter A. Thiel (“Intervenors”).

2. Intervenors file the Pleading in Intervention for Limited Purposes against (1) Lead Plaintiffs in the Nasdaq Action, which are T3 Trading Group, LLC, Avatar Securities, LLC, Phillip Goldberg, Steve Jarvis, Atish Gandhi, Colin Suzman, Meredith Bailey and Faisal Sami and (2) the Nasdaq Defendants, which are The NASDAQ OMX Group, Inc., The NASDAQ Stock Market LLC, Robert Greifeld, and Anna M. Ewing.

3. Intervenors expressly adopt and incorporate all statements in their Memorandum of Law In Support of The Facebook Defendants’ Motion To Intervene.

4. The intervention of Intervenors is necessary to protect their rights to a judgment reduction under the Private Securities Litigation Reform Act of 1995, N.Y. Gen. Oblig. Law § 15-108, and any other applicable law.

5. The intervention of Intervenor is also necessary to protect their rights to make claims against the Nasdaq Defendants.

**PRAYER FOR RELIEF**

- (a) Intervenor should be granted intervention for the limited purposes set forth above.
- (b) The Court should order such other and further relief as is just and appropriate.

Dated: August 17, 2015

Respectfully submitted,

*/s/ Andrew B. Clubok*

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